



March 13, 2008

Via Facsimile and U.S. Mail

Harlan M. Lazarus
Lazarus & Lazarus, P.C.
250 Madison Avenue
8th Floor
New York, New York 10016

Re: Cyber Champion Int'l, Ltd. v. Carlos Falchi, Marcos Falchi and XYZ Cos.


Dear Mr. Lazarus:

HSN LP d/b/a Home Shopping Network (the "Company") is in receipt of your February 6, 2008 Subpoena in a Civil Case (the "Subpoena") seeking records relating to Carlos Falchi, Marcos Falchi, "FALCHI" and "CHI BY FALCHI."

Please be advised that the Company must respectfully object to the Subpoena, for a number of reasons, including, but not limited to the following matters. First, HSN LP objects on the grounds that the requests in the subpoena are overly broad and unduly burdensome, including, but not limited to requests one, five, nine, ten and eleven. Second, the Subpoena does not set forth a specific, relevant time frame for the documents sought and therefore is vague and ambiguous. Also, HSN LP objects to the Subpoena to the extent it (a) seeks information subject to any privilege or doctrine recognized by applicable law including, but not limited to, the attorney-client privilege, the work product doctrine and Florida's trade secrets privilege and (b) seeks information that is proprietary or confidential business information, specifically request eleven which seeks customer information. These objections should not be construed as confirming the existence, or continued existence, of any requested documents.

In addition, please note that it is HSN LP's practice to require that it be compensated for all reasonable costs (including reproduction, clerical, postage, etc.) that it incurs in responding to a subpoena either before or simultaneously with the actual delivery of the requested documents.

Sincerely,


Shauna Burkes
Sr. Counsel